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10 *Elizabeth Perez*

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12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 ELIZABETH PEREZ,

18 Defendant.

CASE NO.: 2:16-cr-00062-LRH-EJY

**STIPULATION TO CONTINUE HEARING  
DATE FOR MOTION TO WITHDRAW  
(cM/ECF 275, 284)**

19 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher D. Baker,  
20 Assistant United States Attorney, and John George, counsel for Elizabeth Perez, that the hearing  
21 on motion to withdraw currently scheduled for January 7, 2020 at the hour of 10:00 a.m. be  
22 vacated and set for January 15, 2020 at the hour of 2:30 p.m..

23 This stipulation is entered into for the following reasons:

24 1) The currently scheduled hearing was set on Friday January 3, 2020 at 3:00 p.m.  
25 2) The currently scheduled time for the hearing conflicts with a preexistent schedule of  
26 counsel for defendant Elizabeth Perez who will be out of this jurisdiction on the 7th at  
27 10:00 a.m.  
28 3) Defendant Elizabeth Perez is not incarcerated and does not object to the continuance.

1           4) The parties agree to the continuance  
2           5) This is the first request to continue this hearing.

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4           DATED this 6th day of January, 2020.

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6           UNITED STATES ATTTORNEY

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8           By: /s/Christopher D. Baker  
CHRISTOPHER D. BAKER, ESQ  
9           Assistant United States Attorney  
Counsel for the United States

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11           LAW OFFICE OF JOHN GEORGE

12           By: /s/ John George  
JOHN GEORGE, ESQ  
13           Counsel for Defendant Elizabeth Perez

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2                   **UNITED STATES DISTRICT COURT**  
3                   **DISTRICT OF NEVADA**

4                   UNITED STATES OF AMERICA,

5                   Plaintiff,

6                   v.

CASE NO.: 2:16-cr-00062-LRH-EJY

7                   ELIZABETH PEREZ,

8                   Defendant.

**FINDINGS OF FACT CONCLUSIONS OF**  
**LAW AND ORDER**

11                   **FINDINGS OF FACT**

12                  Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court  
13 finds that:

14                  1) The currently scheduled hearing was set on Friday January 3, 2020 at 3:00 p.m.  
15                  2) Defense counsel will be out of the district on January 7, 2020  
16                  3) The defendant is not incarcerated and does not object to the continuance  
17                  4) The parties agree that continuance  
18                  5) this is the first requested continue this hearing.

19                  For all of the above-stated reasons, the ends of justice would best be served by a  
20 continuance of the hearing date for the Motion to Withdraw.

23                   **CONCLUSIONS OF LAW**

24                  The ends of justice served by granting this continuance outweigh the best interests of the  
25 public and the defendant in a speedy trial, since the failure to grant this continuance would be  
26 likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and  
27 the opportunity within which to be able to effectively and thoroughly prepare for trial, taking  
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1 into account the exercise of diligence.

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3                   **ORDER**

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5 IT IS HEREBY ORDERED that the Motion to withdraw currently scheduled for January 7,

6 2020 at the hour of 10:00 a.m. be vacated and continued to January 15, 2020 at the hour

7 of 2:30 p.m. in Courtroom 3C.

8                   DATED this 6th day of January, 2019

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11                   UNITED STATES MAGISTRATE/JUDGE

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